

BellSouth Telecommunications, Inc.
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February 9, 2007

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PUBLIC SERVICE
COMMISSION


Ms. Beth O'Donnell
Executive Director
Public Service Commission
211 Sower Boulevard
P. O. Box 615
Frankfort, KY 40602

Re: BellSouth Telecommunications, Inc., Complainant v. Brandenburg
Telephone Company, Defendant
PSC 2006-00546

Dear Ms. O'Donnell:

Enclosed for filing in the above-captioned case are the original and ten (10) copies of BellSouth's Data Requests to Brandenburg Telephone Company.

Sincerely,


Mary K. Keyer

cc: Parties of Record

666440

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:)	
)	
BELLSOUTH TELECOMMUNICATIONS, INC)	
)	
Complainant)	
)	
v.)	Case No. 2006-00546
)	
BRANDENBURG TELEPHONE COMPANY)	
)	
Defendant)	

BELLSOUTH TELECOMMUNICATIONS, INC.'S, DATA REQUESTS
TO BRANDENBURG TELEPHONE COMPANY

DEFINITIONS

1. "BellSouth" means BellSouth Telecommunications, Inc., d/b/a/ AT&T Kentucky, and its subsidiaries, their present and former officers, employees, agents, representatives, directors, and all other persons acting or purporting to act on behalf of BellSouth.
2. "Brandenburg Telephone Company" means Brandenburg Telephone Company and its subsidiaries, their present and former officers, employees, agents, directors, and all other persons acting or purporting to act on behalf of Brandenburg Telephone Company.
3. The terms "you" and "your" refer to Brandenburg Telephone Company.
4. "Relevant Period" for purposes of these Data Requests means April 2002 to March 2004.
5. The term "person" means any natural person, corporation, corporate division, partnership, other unincorporated association, trust, government agency, or entity.

6. "And" and "or" as used herein shall be construed both conjunctively and disjunctively and each shall include the other whenever such construction will serve to bring within the scope of these discovery requests any information that would otherwise not be brought within their scope.

7. The singular as used herein shall include the plural, and vice versa, and the masculine gender shall include the feminine and the neuter.

8. "Identify" or "identifying" or "identification" when used in reference to a natural person means to state:

- a) the full legal name of the person;
- b) the name, title and employer of the person at the time in question;
- c) the present or last known employer of such person;
- d) the present or last known home and business addresses of the person; and
- e) the present home address.

9. "Identify" or "identifying" or "identification" when used in reference to a person other than a natural person means to state:

- a) the full name of the person and any names under which it conducts business;
- b) the present or last known address of the person; and
- c) the present or last known telephone number of the person.

10. "Identify" or "identifying" or "identification" when used in reference to a document means to provide with respect to each document requested to be identified by these discovery requests a description of the document that is sufficient for purposes of a request to produce or a subpoena duces tecum, including the following:

- a) the type of document (e.g., letter, memorandum, etc.);
- b) the date of the document;
- c) the title or label of the document;
- d) the Bates number or other identifier used to number the document for use in litigation;
- e) the identity of the originator;
- f) the identity of each person to whom it was sent;
- g) the identity of each person to whom a copy or copies were sent;
- h) a summary of the contents of the document;
- i) the name and last known address of each person who presently has possession, custody or control of the document; and
- j) if any such document was, but is no longer, in your possession, custody or control or is no longer in existence, state whether it: (1) is missing or lost; (2) has been destroyed; or (3) has been transferred voluntarily or involuntarily, and, if so, state the circumstances surrounding the authorization for each such disposition and the date of such disposition.

11. "Identify," "identifying" or "identity" when used in reference to a communication means to state the date of the communication, whether the communication was written or oral, the identity of all parties and witnesses to the communication, the substance of what was said and/or transpired and, if written, the identity of the document(s) containing or referring to the communication.

GENERAL INSTRUCTIONS

1. If you contend that any response to any Data Request may be withheld under the attorney-client privilege, the attorney work product doctrine or any other privilege or basis, please state the following with respect to each such response in order to explain the basis for the claim of privilege and to permit adjudication of the propriety of that claim:

- a) the privilege asserted and its basis;
- b) the nature of the information withheld; and
- c) the subject matter of the document, except to the extent that you claim it is privileged.

2. These discovery requests are to be answered with reference to all information in your possession, custody or control or reasonably available to you. These discovery requests are intended to include requests for information, which is physically within your possession, custody or control as well as in the possession, custody or control of your agents, attorneys, or other third parties from which such documents may be obtained.

3. If any Data Request cannot be answered in full, answer to the extent possible and specify the reasons for your inability to answer fully.

4. These Data Requests are continuing in nature and require supplemental responses should information unknown to you at the time you serve your responses to these interrogatories subsequently become known.

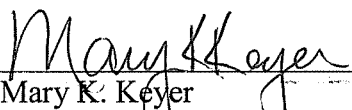
5. For each Data Request, provide the name of the company witness(es) or employee(s) responsible for compiling and providing the information contained in each answer.

DATA REQUESTS

1. Do you contend that the ACS traffic at issue in this case was being routed during the Relevant Period over any trunk group, including EAS trunk groups, other than the Common Transport Trunk Group (“CTTG”)? If so, identify and provide any and all documentation that supports that contention. If not, please state so in your response.

2. Do you contend that BellSouth did not pay Brandenburg the full amounts due, other than amounts pertaining to disputes unrelated to the issues in this case, on the SN-642-NET statements between BellSouth and Brandenburg during the Relevant Period? If so, please identify and provide any and all documentation that supports that contention. If not, please state so in your response.

Respectfully submitted,


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CERTIFICATE OF SERVICE -- KPSC 2006-00546

It is hereby certified that a true and correct copy of the foregoing was served on the following individuals by U.S. mail and email, this 9th day of February, 2007.

John E. Selent
Holly C. Wallace
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Mary K. Keyer